

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF VIRGINIA  
Norfolk Division

RECOVERY LIMITED PARTNERSHIP,  
Plaintiff,

v.

Civil Action No.: 2:87-cv-00363

UNIDENTIFIED, WRECKED AND ABANDONED  
SAILING VESSEL, etc.,  
Defendant.

**NOTICE OF MOTION TO SEAL**

TAKE NOTICE THAT Recovery Limited Partnership (the “Plaintiff” or “RLP”), by counsel, pursuant to the Letter of this Court dated February 16, 2024 (*See* ECF #311), moves this Court for leave to file under seal its Memorandum Responding to Letter of the Court Dated February 16, 2024, attached to the memorandum in support of RLP’s motion to seal.

This serves as public notice that RLP is moving to file the above document under seal. RLP’s grounds for seeking leave to file the above pleading under seal are set forth in its Motion to Seal and Memorandum in Support. Any party or non-party who opposes or objects to the sealing of this document must file its objection with the Clerk of Court within seven (7) days after the filing of this motion to seal. If no objection is filed in a timely manner, the Court may treat the motion to seal as uncontested.

This 1st day of March, 2024.

/s/ James L. Chapman, IV  
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*Counsel for Recovery Limited Partnership*

**CERTIFICATE OF SERVICE**

I hereby certify that on the 1st day of March, 2024, a true and accurate copy of the foregoing was electronically filed with the Clerk of the Court using the CM/ECF system, which will then send a notification of such filing to all registered filers.

*/s/ James L. Chapman, IV*  
\_\_\_\_\_  
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